VOICE AND DATA SERVICES

Kyle Kelly VP of Sales



## COMPLIANCE CERTIFICATE

State of Washington	)
	) ss
County of King	)

I, Kyle Kelly, do hereby state that I am Vice President of Sales of World Communications, Inc. ("WCI") and am authorized to make this certification on behalf of WCI.

Under the penalties of perjury, I hereby aver that I have personal knowledge that WCI has established operating procedures that are adequate to ensure compliance – and that the Company complies - with the Federal Communications Commission's rules governing protection of Customer Proprietary Network Information pursuant to Section 64.2009, 47 C.F.R. §64.2009.

Dated this 3rd day of February, 2006.

World Communications, Inc.

By:

Kyle Kelly

Vice President of Sales

WORLD COMMUNICATIONS, INC.

190 Queen Anne Ave N. Ste. 250

Seattle, WA 98109

WCI

## Via Electronic ECFS Filing

February 3, 2006

Ms. Marlene H. Dortch Office of the Secretary Federal Communications Commission 445 12th Street, SW, Washington, DC 20554

RE: Certification of CPNI Filing (February 6, 2006), EB-06-TC-060

Dear Ms. Dortch:

Pursuant to section 64.2009(e) of the Commission's rules<sup>2</sup> and the Commission's *Public Notice*, DA 06-233, dated January 30, 2006, World, Communications, Inc. hereby submits its compliance certificate and a statement explaining how the Company's operating procedures ensure compliance with these regulations.

By the attached Certificate, I hereby certify to the Commission that World, Communications, Inc. has established, and strictly follows, policies and operating procedures to fully comply with section 64.2009 of the Commission's rules governing Customer Proprietary Network Information ("CPNI").

World, Communications, Inc. has established strict policies, which expressly prohibit release of CPNI to any employee not directly involved in the provision of service to the customer, subject to disciplinary action and termination of employment. Each employee receives an initial CPNI protection briefing and annual CPNI protection requirement reviews thereafter. All employees are strictly held to non-disclosure agreements.

CPNI data is accessible only to those employees with a "need to know" for purposes of serving current subscribers. The Company does not sell, or otherwise release, CPNI to other entities under any circumstances. World, Communications, Inc. has no affiliates. All contact with customers is documented through retention of electronic copies of communications and retention of any scripts used if contacting subscribers telephonically, for a minimum period of one year. All sales or marketing campaigns initiated by the Company require my approval. I am responsible for ensuring that each campaign strictly complies with the Commission's CPNI regulations.

Questions regarding this matter may be directed to me.

Sincerely,

Kyle Kelly, VP of Sales

WORLD COMMUNICATIONS, INC.

<sup>2</sup> 47 C.F.R. §64.2009(e).